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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,
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11 Plaintiff,
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13 vs.
14 EMERALD RUTH WILSON-BEY,
15 Defendant.

CASE NO: 2:21-cr-00306-GMN-NJK

STIPULATION AND ORDER TO
CONTINUE CHANGE OF PLEA
HEARING

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18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson
19 United States Attorney, through Jim. W. Fang, Assistant United States Attorney, counsel for the
20 United States of America, and Jennifer M. Waldo counsel for Emerald Ruth Wilson-Bey that the
21 Change of Plea hearing, currently scheduled for Tuesday, November 29, 2022 be vacated and
22 continued to a date and time convenient to this court, but no sooner than forty-five (45) days
23 from the current setting.
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STIPULATION AND ORDER TO CONTINUE CHANGE OF PLEA HEARING - 1

The Stipulation is entered into for the following reasons:

1. That the parties resolved this matter through pretrial plea negotiations and have submitted a fully-executed plea agreement to the Court for its consideration;
2. On November 2, 2022, an expedited change of plea hearing was set for December 6, 2022 at 11:00 a.m.;
3. That after the above date was set, counsel for Ms. Wilson-Bey was scheduled for surgery on December 6, 2022;
4. That based upon the stipulation of parties (ECF No.: 117), the change of plea Hearing was moved up to November 29, 2022;
5. That counsel now needs additional time to speak with Ms. Wilson-Bey regarding questions and/or concerns she has related to the plea agreement to ensure Ms. Wilson-Bey fully understands the plea agreement and the consequences of same;
6. That counsel for Ms. Wilson-Bey has spoken to government counsel and the government has no objection to continuing the change of plea hearing; and
7. This is the first request to continue the change of plea hearing.

DATED this 28th day of November, 2022.

JASON M. FRIERSON
United States Attorney

/s/ Jim W. Fang

Counsel for USA

WALDO LAW, LLC.

/s/ Jennifer M. Waldo

Counsel for Emerald Wilson-Bey

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7 UNITED STATES DISTRICT COURT
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9 UNITED STATES OF AMERICA,
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11 Plaintiff,
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13 vs.
14 EMERALD RUTH WILSON-BEY,
15 Defendant.

CASE NO: 2:21-cr-00306-GMN-NJK

**STIPULATION AND ORDER TO
CONTINUE CHANGE OF PLEA
HEARING**

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19 **FINDINGS OF FACT**

- 20 1. That the parties resolved this matter through pretrial plea negotiations and have
21 submitted a fully-executed plea agreement to the Court for its consideration;
- 22 2. On November 2, 2022, an expedited change of plea hearing was set for December
23 6, 2022 at 11:00 a.m.;
- 24 3. That after the above date was set, counsel for Ms. Wilson-Bey was scheduled for
25 surgery on December 6, 2022;
- 26 4. That based upon the stipulation of parties (ECF No.: 117), the change of plea
Hearing was moved up to November 29, 2022;

7. This is the first request to continue the change of plea hearing.

The ends of justice served by granting said continuance outweigh the best interests of the public and the defense in a proceeding with the change of plea hearing as currently scheduled.

IT IS THEREFORE ORDERED that the change of plea hearing currently scheduled for November 29, 2022 at 9:00 a.m., be vacated and continued to the 17th day of January _____, 2023, at the hour of 11:00 a.m .

DATED AND DONE this 28 day of November, 2022.

UNITED STATES DISTRICT JUDGE

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